

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION

IN RE: : Chapter 13 Proceeding
Ricky Charles Reynolds and :
Tracy Marie Reynolds, :
Debtors. : Case No. 11-10186-jdw

**NOTICE OF TIME TO RESPOND TO MOTION TO MODIFY CHAPTER 13 PLAN
AFTER CONFIRMATION**

PLEASE TAKE NOTICE THAT THE DEBTORS HAVE FILED A MOTION TO MODIFY CHAPTER 13 PLAN AFTER CONFIRMATION.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WANT TO CONSULT ONE.)

IF YOU DO NOT WANT THE COURT TO GRANT THE DEBTORS' MOTION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE MOTION, THEN YOU OR YOUR ATTORNEY **MUST FILE WITH THE COURT A WRITTEN OBJECTION ON OR BEFORE MARCH 1, 2013. THE OBJECTION OR RESPONSE SHOULD BE SENT TO THE CLERK OF COURT, U.S. BANKRUPTCY COURT, MIDDLE DISTRICT OF GEORGIA, PO BOX 1957, MACON, GEORGIA 31202. IF ANY OBJECTIONS ARE FILED, A HEARING WILL BE HELD ON APRIL 9, 2013 AT 2:00 P.M. IN THE UNITED STATES BANKRUPTCY COURT, ALBANY, GEORGIA.**

IF YOU MAIL YOUR REQUEST TO THE COURT FOR FILING, YOU MUST MAIL IT EARLY ENOUGH SO THE COURT WILL **RECEIVE** IT ON OR BEFORE THE DATE STATED ABOVE.

ANY RESPONSE OR OBJECTION MUST ALSO BE MAILED TO THE MOVING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.

IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY ENTER AN ORDER GRANTING THAT RELIEF.

This 8th day of February, 2013.

/s/ Robert J. Pinnero
Robert J. Pinnero
Attorney for Debtors
State Bar No. 580389
510-B W. Broad Avenue
Post Office Box 1379
Albany, Georgia 31702-1379
(229) 436-9661

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MOTION TO MODIFY CHAPTER 13 PLAN AFTER CONFIRMATION

The Debtors, by and through their attorney, and under the authority of Section 1329 of the Bankruptcy Code, files this motion for modification of their plan and respectfully shows:

1.

The plan was confirmed on November 4, 2011, and since confirmation the Debtors wish to modify their Chapter 13 plan.

2.

That the Debtors propose to modify their Chapter 13 plan to pay HSBC/Polaris. This modification will increase their Chapter 13 plan payment to \$1,374.00 per month for the remainder of the plan.

3.

That the modification proposed by the Debtors will not modify the rights of the holder of any secured claim being dealt with under the plan.

4.

That a copy of the Debtor's modified Chapter 13 plan dated February 8, 2013 is attached to this motion.

5.

After notice and an opportunity for objections, the plan as modified should become the Debtors' plan.

WHEREFORE, the Debtors pray that this motion for modification be approved.

This 8th day of February, 2013.

/s/ Robert J. Pinnero
Robert J. Pinnero
Attorney for Debtors
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CERTIFICATE OF SERVICE

This is to certify that I have this day served a true and exact copy of the foregoing Notice Of Time To Respond To Motion To Modify Chapter 13 Plan After Confirmation, Motion To Modify Chapter 13 Plan After Confirmation, and Modified Chapter 13 Plan, Case No. 11-10186-JDW, by depositing same in the United States mail with sufficient postage affixed thereon to ensure delivery to the Chapter 13 Trustee and all creditors listed on the attached.

This 8th day of February, 2013.

/s/ Robert J. Pinnero
Robert J. Pinnero
Attorney for Debtors
State Bar No. 580389
510-B W. Broad Avenue
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